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5 Attorneys for Defendants

6 Reliable Credit Association, Inc., and

Reliable Credit Association, Inc. (WA)

7

8 UNITED STATES DISTRICT COURT

9 WESTERN DISTRICT OF WASHINGTON

10 HOLLY SMART, an individual,

Case No. 2:18-cv-448-JCC

11 Plaintiff,

DECLARATION OF KIMBERLEY HANKS  
MCGAIR IN SUPPORT OF RELIABLE  
CREDIT ASSOCIATION, INC., AND  
RELIABLE CREDIT ASSOCIATION, INC.  
(WA)'S MOTION FOR EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT

12 v.

13 EMERALD CITY RECOVERY, LLC,  
RELIABLE CREDIT ASSOCIATION,  
INC. AND RELIABLE CREDIT  
ASSOCIATION, INC. (WA),

15 Defendants.

16

17 I, Kimberley Hanks McGair, hereby declare as follows:

18 (1) I am one of the attorneys representing Defendants Reliable Credit  
19 Association, Inc., and Reliable Credit Association, Inc. (WA) (collectively, "Reliable") and I  
20 have personal knowledge of the facts set forth in this Declaration.

21 (2) The parties need time to confer regarding potential motions that Reliable  
22 may bring against the complaint. If the parties are unable to resolve those issues, Reliable  
23 intends to move for dismissal.

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ASSOCIATION, INC. (WA)'S MOTION FOR EXTENSION OF TIME TO  
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4 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE  
5 BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE  
6 FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

7 DATED April 25, 2018.

FARLEIGH WADA WITT

10 By: /s/ Kimberley Hanks McGair  
11 Kimberley Hanks McGair, WSBA #30063  
12 (503) 228-6044  
13 kmcgair@fwlaw.com  
Attorneys for Defendants Reliable Credit  
Association, Inc., and Reliable Credit  
Association, Inc. (WA)

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1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on April 25, 2018, I electronically filed the foregoing with the  
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to the  
4 following:

5                   Christopher Green  
6                   GreenLawFirm  
7                   225 106<sup>th</sup> Ave NE  
8                   Bellevue, WA 98005  
9                   [Chris@MyFairCredit.com](mailto:Chris@MyFairCredit.com)  
10                  Attorney for Plaintiff

11                  FARLEIGH WADA WITT

12                  By: /s/ Kimberley Hanks McGair  
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15                  [kmcgair@fwqlaw.com](mailto:kmcgair@fwqlaw.com)  
16                  Attorneys for Defendants Reliable Credit  
17                  Association, Inc., and Reliable Credit  
18                  Association, Inc. (WA)

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